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8 IN THE UNITED STATES DISTRICT COURT  
9 EASTERN DISTRICT OF CALIFORNIA  
10

11 UNITED STATES OF AMERICA,  
12 Plaintiff,

13 v.

14 APPROXIMATELY \$42,800.00 IN U.S.  
CURRENCY,  
15 Defendant.  
16

CASE NO. 1:20-CV-00727-DAD-EPG  
AFFIDAVIT OF DEAN CARDINALE

17 1. I am a Task Force Officer (TFO) with the U.S. Drug Enforcement Administration (DEA),  
18 assigned to the Fresno Area Surveillance Team (FAST), and have been so assigned since November  
19 2015. During this time, I received training in the investigation of violations of Title 21, United States  
20 Code, Sections 841(a)(1) and 846. I am currently employed as a police officer with the Fresno Police  
21 Department for the past 23 years. During that time, I worked drug and asset forfeiture investigations for  
22 the Fresno Police Department major narcotics unit for 9 years. Based on my experience and training I  
23 have become knowledgeable regarding tactics employed by drug traffickers to manufacture, transport,  
24 distribute and conceal illegal drugs.

25 2. This affidavit is made in support of a warrant for arrest of approximately \$42,800.00 in  
26 U.S. Currency (hereafter "defendant currency"). The defendant currency constitutes money furnished  
27 and intended to be furnished in exchange for a controlled substance or listed chemical, constituted  
28 proceeds traceable to such an exchange, and was used or intended to be used to commit or facilitate a

1 violation of 21 U.S.C. §§ 841, *et seq.* As a result of the foregoing, the defendant currency is subject to  
2 forfeiture to the United States pursuant to 21 U.S.C. § 881(a)(6).

3         3.         The facts set forth in this affidavit are known to me as a result of my personal  
4 observations, observations of other law enforcement officers, through conversations with other agents  
5 and/or detectives who have participated in this investigation, and from reviewing official reports,  
6 documents, and other evidence obtained as a result of the investigation and I have determined the  
7 following:

8         4.         On November 17, 2019, the Fresno Police Department (“FPD”) responded to 5361 East  
9 Lamona Avenue in Fresno, California to investigate a reported homicide. FPD arrived at the scene and  
10 located ten victims with gunshot wounds. Three of the victims were declared deceased at the scene. A  
11 fourth victim was transported to Community Regional Medical Center in Fresno for treatment, but was  
12 later pronounced dead. The remaining six victims were transported to St. Agnes Medical Center in  
13 Fresno, and later released.

14         5.         Thereafter, the Fresno Police Department and FBI initiated an investigation into the  
15 November 17th shootings and connections to local criminal gangs, specifically, the Asian Crips and the  
16 Mongolian Boys Society, and any dispute over interstate drug trafficking territory.

17         6.         On December 26, 2019, law enforcement executed eighteen search warrants on various  
18 locations associated with local criminal gangs and residences of individuals with connections to the  
19 November 17, 2019 homicides. Specifically, a search warrant was issued for a residence located at 1442  
20 N. 8th Street, Fresno, California, an address connected to Kong Vang, an admitted broker of illegal  
21 marijuana.

22         7.         On December 26, 2019, law enforcement executed a search warrant at 1442 N. 8th Street,  
23 and encountered five individuals, including Kong Vang, his girlfriend Meekeo Sengsavang  
24 (“Sengsavang”), and three other individuals. Kong Vang and Sengsavang confirmed that they occupied  
25 the northeast bedroom. A third individual confirmed that he occupied a garage that had been converted  
26 into a bedroom. The fourth and fifth individuals confirmed they lived in the southwest bedroom of the  
27 residence.  
28

1           8.       In the northeast bedroom an FPD detective located a brown purse containing the  
2 Defendant Currency – approximately \$42,800.00 in cash. The purse also contained marijuana, a  
3 Minnesota Driver’s License for Sengsavang, a social security card for Sengsavang, and a gold iPhone.  
4 The \$42,800.00 in cash was bundled in five separate individual stacks and rubber-banded. The defendant  
5 currency was all in \$100 denominations. Inside a dresser also in the northeast bedroom, law enforcement  
6 located a brown bag with a white iPad inside. In addition, law enforcement identified a receipt book and  
7 notepad representing “pay/owe” sheets for completed drug sales.

8           9.       Law enforcement then interviewed Kong Vang regarding the \$42,800 in bundled cash  
9 found in his bedroom. Kong Vang told law enforcement that he works as an interstate marijuana  
10 broker—and brokering marijuana deals was his only employment. Kong Vang boasted to law  
11 enforcement that he has marijuana clients all over the United States and planned to show Sengsavang  
12 where to purchase marijuana clones. Kong Vang acknowledged that a portion of the Defendant Currency  
13 was involved in illegal drug sales as it was designated for the purchase of marijuana clones. Kong Vang  
14 stated that a smaller portion of the cash was for Sengsavang to purchase a car.

15          10.       Law enforcement then interviewed Sengsavang, who stated that she lives in Minnesota  
16 and had been instructed by Kong Vang to fly to Sacramento, California with \$9,000.00. Sengsavang told  
17 law enforcement that she arrived in California a few days prior to the search warrant and that Kong Vang  
18 picked her up at the airport and drove her to the house at 1442 N. 8th Street. Sengsavang told law  
19 enforcement that she is unemployed and that the Defendant Currency was largely for the purchase of  
20 marijuana clones.

21          11.       As a result of the search of the other 17 locations on December 26, 2019, six suspects  
22 were arrested, and law enforcement seized two firearms believed to be connected to the underlying  
23 homicide investigation, twelve additional weapons, and a total of \$46,000.00 in cash believed to be  
24 related to drug activity. Those arrests have resulted in federal murder charges in the Eastern District of  
25 California, *United States v. Pao Vang, et al.*, 1:20-MJ-00002-SKO as well as state felony murder charges,  
26 *The People v. Ger Lee, et al.*, Fresno Superior Court case number F20900024.

27          12.       Kong Vang has a criminal history which includes multiple felony arrests, many of them  
28 drug-related, and misdemeanor convictions for burglary and domestic violence.

13. Based on the foregoing, I have probable cause to believe that the defendant currency was intended for the purchase of illegal drugs or is proceeds from drug trafficking or a conspiracy of such offense in violation of 21 U.S.C. §§ 841, *et seq.* It is respectfully requested that a Warrant for Arrest of Articles *In Rem*, pursuant to the Supplemental Rules for Admiralty or Maritime Claims and Asset Forfeiture Actions Rule G(3)(b)(i), be issued for the defendant currency listed above.

  
DEAN CARDINALE  
Task Force Officer  
Drug Enforcement Administration

Affidavit submitted by email/pdf and attested to me as true and accurate by telephone consistent with Fed. R. Crim .P. 4.1 before me this 3<sup>rd</sup> day of June 2020.

  
Honorable SHEILA K. OBERTO  
United States Magistrate Judge

Reviewed and approved as to form:

/s/ Kevin C. Khasigian  
Kevin C. Khasigian  
Assistant U.S. Attorney